

7. Throughout the investigation of the claim, “Country” never advised Plaintiff that her Claim was going to be denied.
8. “Country” has wholly failed, refused and neglected to pay Plaintiff’s claim.
9. The Defendant, Country Mutual Insurance Company d/b/a Country Financial, breached its contract of insurance with the Plaintiff by refusing to pay the legitimate claim under her policy of insurance.
10. The Actions of Defendant in adjusting the loss suffered by Plaintiff was a reckless and willful failure to exercise good faith and fair dealing, for which Plaintiff suffered severe emotional distress, loss of monies and other damages.

WHEREFORE, premises considered, Plaintiff prays for judgment against Defendant for a sum in excess of \$10,000.00 actual damages, a sum in excess of \$75,000.00 for punitive damages, interest, costs, attorneys’ fees and such other further relief to which they are deemed entitled.

Respectfully Submitted,

THOMAS & FUNDERBURK, PLLC

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